FILED 1 6/14/2022 2 CENTRAL DISTRICT OF CALIFORNIA ___ DEPUTY 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA 10 March 2022 Grand Jury CR 2:22-cr-00253-RGK 11 UNITED STATES OF AMERICA, 12 Plaintiff, I N D I C T M E N T 13 v. [18 U.S.C. § 1951(a): Interference with Commerce by Robbery and 14 STEVO MIJANOVIC, Attempted Interference with Commerce by Robbery; 18 U.S.C. 15 Defendant. § 924(c)(1)(A)(ii): Possess, Use, Carry, and Brandish a Firearm in 16 Furtherance of and During and in Relation to a Crime of Violence] 17 18 The Grand Jury charges: 19 COUNT ONE 20 [18 U.S.C. § 1951(a)] On or about August 4, 2021, in Los Angeles County, within the 21 22 Central District of California, defendant STEVO MIJANOVIC obstructed, 23 delayed, and affected commerce and the movement of articles and 24 commodities in commerce by knowingly and willingly committing 25 robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$80 in cash, belonging to Pregio 26 27 Pizza, located at 128 West Pacific Coast Highway, in Los Angeles,

California, a retail business, the inventory of which traveled in

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interstate commerce, in the presence of employees of Pregio Pizza,
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    against their will, by means of actual and threatened force,
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    violence, and fear of injury, immediate and future, to their persons.
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COUNT TWO

[18 U.S.C. § 1951(a)]

On or about August 5, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$138 in cash, belonging to Dollar Tree, located at 1119 West Pacific Coast Highway, in Wilmington, California, a retail business, the inventory of which traveled in interstate commerce, in the presence of an employee of Dollar Tree, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person.

COUNT THREE

[18 U.S.C. § 1951(a)]

On or about December 26, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$585 in cash, belonging to El Pollo Loco, located at 702 North Avalon Boulevard, in Wilmington, California, a retail business, the inventory of which traveled in interstate commerce, from the person and in the presence of employees of El Pollo Loco, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons.

COUNT FOUR

[18 U.S.C. § 1951(a)]

On or about December 27, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$150 in cash, belonging to Subway, located at 1681 West Carson Street, in Torrance, California, a retail business, the inventory of which traveled in interstate commerce, in the presence of employees of Subway, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons.

COUNT FIVE

[18 U.S.C. § 1951(a)]

On or about December 27, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by knowingly and willingly attempting to commit robbery, in that defendant MIJANOVIC unlawfully attempted to take and obtain property belonging to La Michoacana Premier, located at 683 West 9th Street, in San Pedro, California, a retail business, the inventory of which traveled in interstate commerce, from the person and in the presence of employees of La Michoacana Premier, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons.

COUNT SIX

[18 U.S.C. § 1951(a)]

On or about December 30, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$180 in cash, belonging to Shell Gas, located at 1403 North Wilmington Boulevard, in Wilmington, California, a retail business, the inventory of which traveled in interstate commerce, in the presence of an employee of Shell Gas, against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person.

COUNT SEVEN

[18 U.S.C. § 924(c)(1)(A)(ii)]

On or about December 30, 2021, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC knowingly used and carried a firearm during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this Indictment, and, in so doing, brandished that firearm.

COUNT EIGHT

[18 U.S.C. § 1951(a)]

On or about January 2, 2022, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$1,000 in cash, belonging to Mi Pueblito San Juan Restaurant, located at 1341 North Wilmington Boulevard, in Wilmington, California, a retail business, the inventory of which traveled in interstate commerce, in the presence of employees of Mi Pueblito San Juan Restaurant, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons.

COUNT NINE

[18 U.S.C. § 924(c)(1)(A)(ii)]

On or about January 2, 2022, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC knowingly used and carried a firearm during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eight of this Indictment, and, in so doing, brandished that firearm.

COUNT TEN

[18 U.S.C. § 1951(a)]

On or about January 6, 2022, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$300 in cash, belonging to Chevron Gas, located at 1403 North Wilmington Boulevard, in Wilmington, California, a retail business, the inventory of which traveled in interstate commerce, in the presence of an employee of Chevron Gas, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person.

COUNT ELEVEN

[18 U.S.C. § 1951(a)]

On or about January 6, 2022, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by knowingly and willingly committing robbery, in that defendant MIJANOVIC unlawfully took and obtained property consisting of approximately \$300 in cash, belonging to 7-Eleven, located at 1831 South Pacific Avenue, in San Pedro, California, a retail business, the inventory of which traveled in interstate commerce, from the person and in the presence of employees of 7-Eleven, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons.

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COUNT TWELVE

2 [18 U.S.C. § 924(c)(1)(A)(ii)] 3 On or about January 6, 2022, in Los Angeles County, within the Central District of California, defendant STEVO MIJANOVIC knowingly 4 5 used and carried a firearm during and in relation to, and possessed that firearm in furtherance of, a crime of violence, namely, 6 7 interference with commerce by robbery, in violation of Title 18, 8 United States Code, Section 1951(a), as charged in Count Eleven of 9 this Indictment, and, in so doing, brandished that firearm. 10 11 A TRUE BILL 12 /s/ 13 Foreperson 14 TRACY L. WILKISON 15 United States Attorney 16 Christina Shy for SMG 17 SCOTT M. GARRINGER 18 Assistant United States Attorney Chief, Criminal Division 19 JOANNA M. CURTIS 20 Assistant United States Attorney Chief, Violent & Organized Crime 21 Section 22 JENNIFER CHOU Assistant United States Attorney 23 Violent & Organized Crime Section 24 25 26 27 28